

# KLEHR | HARRISON | HARVEY | BRANZBURG LLP

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June 21, 2018

**VIA FACSIMILE ((215) 580-2141)**

Hon. Jan E. DuBois  
United States District Court  
Eastern District of Pennsylvania  
601 Market Street  
Philadelphia, Pennsylvania 19106

**Re: *Kilbride Investments, Ltd., et al. v. Cushman & Wakefield of Pennsylvania, Inc., et al.*, No. 13-CV-05195 (E.D. Pa.)**

Dear Judge DuBois:

We represent defendant Cozen O'Connor, P.C. ("Cozen") in the above-referenced action. We write in connection with this Court's order of May 24, 2018, Docket No. 215 (the "Order"), which requires counsel to jointly report to the Court on or before June 22, 2018 with respect to whether the case is settled. The Order also requires counsel to state whether some form of alternative dispute resolution might be of assistance in resolving the case and, if so, what form of alternative dispute resolution is preferred. Finally, the Order directs counsel to submit a proposed schedule for further pre-trial proceedings in the event that the case has not settled and the parties do not agree on alternative dispute resolution.

In terms of alternative dispute resolution and settlement, the parties to this case have already engaged in an extensive mediation of this case in September 2017 with an experienced mediator. Although plaintiffs and Blank Rome settled their dispute as a result of that mediation, the settlement positions of plaintiffs and Cozen were meaningfully different at the conclusion of the mediation session.

Yesterday, June 20, 2018, Cozen received a new settlement demand from plaintiffs. Cozen's counsel has not yet had the opportunity to consult with management of the firm and the firm's insurance carriers to have a meaningful discussion concerning the settlement demand that we received. We plan to have this discussion within the next week. Obviously, the outcome of that discussion will impact the content of the joint report concerning whether the case is settled. Accordingly, we respectfully request that the Court approve a brief extension, until July 2, 2018, of the deadline to report to the Court on settlement.

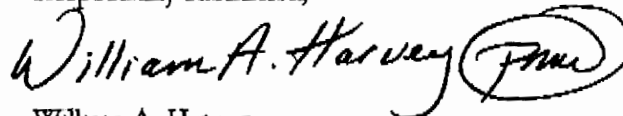
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We have consulted with counsel for the other parties concerning this request for an extension of the deadline contained in the Order. Plaintiffs and third-party defendant JFK BLVD Acquisition GP, LLC agree to the extension, and defendant Cushman & Wakefield does not oppose the request. Should you require any additional information, Cozen would be pleased to provide it.

Respectfully submitted,

A handwritten signature in black ink that reads "William A. Harvey". The signature is written in a cursive style, with the first name "William" and last name "Harvey" clearly legible. There is a large, stylized circular flourish at the end of the signature.

William A. Harvey

cc: Mary Kay Brown, Esq. (via email)  
Jayne Risk, Esq. (via email)  
Andrew Tettelman (via email)